

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

CONNOR NEECK
and **ISAIAH WEST**,
individually and on behalf
of all others similarly situated,

Plaintiffs,

Case No. 19-cv-834

vs.

BADGER BROTHERS MOVING LLC,

Defendant.

**UNOPPOSED MOTION FOR CLASS COUNSEL'S COSTS
AND ATTORNEYS' FEES**

NOW COME Plaintiffs, by and through their attorneys, Hawks Quindel, S.C., to respectfully petition the Court for an award of costs and attorneys' fees as set forth below and on those grounds set forth in Plaintiffs' supporting brief.

1. Class Counsel has negotiated the settlement of this Fair Labor Standards Act collective action and Fed. R. Civ. P. 23 class action on behalf of a class that includes 94 individuals.

2. The settlement creates a common settlement fund of \$70,000. Plaintiff petitions for an award of one-third of the common fund as attorneys' fees inclusive of costs, or \$23,333.33.

3. As set forth in greater detail in Plaintiffs' supporting brief, the requested award is appropriate in light of the market value placed on similar cases, the significant risk undertaken by Class Counsel, and the results achieved for the class.

WHEREFORE, Plaintiffs respectfully request that the Court award costs and attorneys' fees as set forth above.

Respectfully submitted this 22nd day of April, 2021.

By: /s/Caitlin M. Madden

HAWKS QUINDEL, S.C.

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